

EXHIBIT F

1 A. No. He was doing different things just
2 like driving a truck around, picking up
3 computers, picking up books, doing this --

4 Warren Davis was working with the
5 science kits. The principal of -- what's
6 that? Loveless? Houston Hill? After they
7 moved him -- removed him from the
8 principal's job, he came out to Logistics
9 to work with the science kits.

10 Q. If you'll look at paragraph 16 of your
11 complaint.

12 A. 16?

13 Q. Yes. Does that say that Ronnie Causey had
14 been hired to work with science kits?

15 A. That say he was assigned to pick up science
16 kits. He wasn't hired to work with science
17 kits. Didn't hire him to work with science
18 kits.

19 Q. It says: On or about August 5th, 2003,
20 Ronnie Causey, white male, and Plaintiff
21 were assigned to pick up science kits. And
22 in parentheses, Causey is a white employee
23 who had been hired to work at Logistics as

1 a Laborer 2 with the science kits.

2 Is that a correct statement or an
3 incorrect statement?

4 A. This is incorrect right here, to work with
5 the science kits. You have to be a Laborer
6 3 to work with the science kits.

7 Q. Okay.

8 A. He might have been picking up some science
9 kits. But work with the science kits, you
10 have to be a Laborer 3.

11 Q. And before this, when y'all had that thing
12 out on the dock, were y'all going to pick
13 up some science kits?

14 A. Yes.

15 Q. Did he do that often?

16 A. No, because those science kits don't -- I
17 think they stay out maybe a month or so,
18 and then we'll go out -- everybody will
19 pick them up. Everybody deliver them. I
20 mean, there's so many. You know, imagine
21 60 schools. Everybody that can drive goes
22 out and picks up science kits and delivers.

23 Q. Do you know whether Betty Smith ranked you

1 Q. Anything else? Any other racial statements
2 or racist statements Mike Strength made?

3 A. That's the only ...

4 Q. In Exhibit 10, did you tell Mr. Barker
5 about those statements other than just
6 saying he had made some racial statements?

7 A. No, I didn't pinpoint it like that.

8 Q. You say that Mike Strength assigned
9 demoralizing tasks to blacks; is that
10 right?

11 A. Yeah.

12 Q. And what did you consider a demoralizing
13 task?

14 A. I was asked on several occasions to go out
15 and -- like you'll see on there, the
16 supervisor thing, to wash his car and wash
17 the director car, so I did that.

18 Next, he would send you out there like
19 at 12 o'clock in the day. I never seen a
20 white person out there cutting grass. And
21 you had to cut this whole big field out
22 there with a push mower. We had to do
23 that.

1 And one of the -- what's his name had
2 to go over to Daisy Lawrence -- that's
3 where -- In the basement, we carried the
4 computers and things down there, and that's
5 where they used -- was using the storage
6 area for, the computers and things. And
7 all the sewage pipe had busted and drained
8 down in there.

9 He sent Jerome Williams, myself, and
10 Johnny Mitchell over there I guess for a
11 week or two. One of the guys got sick from
12 it, and they -- Jerome Williams, I think.
13 I don't know if he quit or -- because he
14 didn't show up for two or three days. I
15 don't know if they fired him or he just
16 quit.

17 And it wasn't nothing but blacks over
18 there.

19 Q. So in that Exhibit 10, you told Mr. Barker
20 the example about Mike Strength saying get
21 out there and wash my car and wash Jacky
22 Todd's car, too. You told him about that
23 one? Yes or no.